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8 *Sergio Palacios, and Clayton Stelter*

9 UNITED STATES DISTRICT COURT  
10 CENTRAL DISTRICT OF CALIFORNIA  
11 WESTERN DIVISION

12 KORRELL SANTANA COLE,  
13 Plaintiff,  
14  
15 v.  
16 LOS ANGELES COUNTY, et al.,  
17 Defendants.

CASE NO. 2:23-cv-10392-SB-PD  
Hon. Stanley Blumenfeld, Jr.

**DECLARATION OF ALAINA BIRD  
IN SUPPORT OF DEFENDANTS'  
EX PARTE APPLICATION FOR  
COUNSEL OF RECORD ALAINA  
BIRD TO APPEAR IN LIEU OF  
LEAD COUNSEL ANDREW BAUM  
AT DECEMBER 16, 2024 HEARING**

*Ex Parte Application, Declaration of  
Andrew Baum, and [Proposed] Order  
filed concurrently herewith*

**[DISCOVERY MATTER FOR  
DETERMINATION BY  
HON. PATRICIA DONAHUE]**

**DECLARATION OF ALAINA BIRD**

I, Alaina Bird, declare and state as follows:

1. I am an attorney at law duly licensed to practice before all courts in the State of California and the United States District Court for the Central District of California. I am an associate at Glaser Weil Fink Howard Jordan & Shapiro LLP, attorneys of record for Defendants Robert Luna, Andrew Palencia, Brian Pineda, Sergio Palacios, and Clayton Stelter (“Defendants”).

2. I submit this declaration in support of Defendants’ *Ex Parte* Application filed concurrently herewith. The facts set forth below are true of my own personal knowledge, and if called upon to testify as to them, I could and would competently do so under oath.

3. I will be available to attend in person and prepared to argue at the December 16, 2024 hearing set by the Honorable Patricia Donahue on Plaintiff’s motions at Dkts. 71 and 72. (*See* Dkt. 82.)

4. I called Plaintiff’s counsel, Stephen Yagman, this morning to notify him about Defendants’ *Ex Parte* Application. I informed him that Defendants would be filing their *Ex Parte* Application today, December 10, 2024, for an order authorizing myself to appear in lieu of Andrew Baum, Defendants’ lead counsel of record, at the December 16, 2024 hearing before Magistrate Judge Donahue. Mr. Yagman stated that Plaintiff would not oppose Defendants’ *Ex Parte* Application.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on December 10, 2024, at San Diego, California.

/s/ Alaina Bird  
Alaina Bird